

FEB 16 2011

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

BY BCF

DEPUTY

IN RE: MUTUAL FUNDS INVESTMENT §	MDL 1586
LITIGATION §	
§	Case No. 04-md-15863
§	(Judge Motz)
IN RE: ALGER, COLUMBIA, JANUS, §	
MFS, ONE GROUP, PUTNAM AND §	<b>KIMBERLY J. CLIFTON'S</b>
ALLIANZ DRESDNER §	<b>AMENDED OBJECTION TO</b>
§	<b>SETTLEMENT, OBJECTION TO</b>
§	<b>ATTORNEYS' FEES REQUEST</b>
§	<b>NOTICE OF INTENTION TO</b>
§	<b>APPEAR AND REQUEST TO</b>
§	<b>SPEAK AT THE HEARING</b>

TO THE HONORABLE DISTRICT JUDGE:

Objector moves to quash the deposition of Kimberly J. Clifton for the following reasons:

I.

Clifton is a class member. The only documents she has relative to Allianz are attached to her objection. Clifton fully complied with the requirements of the notice and settlement agreement.

II.

I am representing Clifton on a pro bono basis. There is no "retention agreement." I have not offered her any inducement to object and she contacted me through her husband. I did not initiate contact.

III.

Based upon the above, there is no rational explanation for Plaintiff's conduct other than a fishing expedition calculated to multiply the proceedings unreasonably and to harass and intimidate Clifton.

IV.

There is no need for Clifton's testimony to be perpetuated as she has lived in Dallas more than ten years and she is in excellent health. Additionally, Rule 27(b). Fed.R.Civ.Proc. requires the party seeking the deposition to give reasons for perpetuating testimony. Lead counsel has not done that.

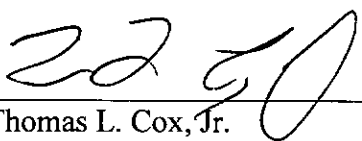
V.

As for the documents requested in Schedule A there are none. As stated above, all Clifton's documents were attached to her objections and there is no retention agreement.

VI.

If the Court overrules this motion we reserve the right to seek fees and costs under 28 U.S.C.A. §1927.

Respectfully submitted,

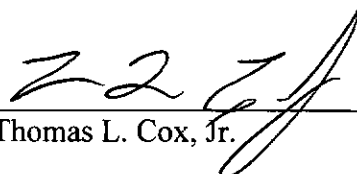
  
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing document has been mailed on the 11th day of February, 2011 as follows:

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